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February 10, 1999

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals, 445 Twelfth St., S.W.
Washington, D.C. 20554

Re: **Ex Parte** in CC Docket Nos. 98-121, 96-98, 98-147, 98-11, 98-26, 98-115, 98-78, 98-91 and 98-56 (RM-9101)

Dear Ms. Salas:

This is to inform you that on February 8, 1999 representatives of Sprint and BellSouth met with Chairman William Kennard and Kathy Brown, his Chief of Staff. Attached is an outline of the points discussed by Sprint and BellSouth at the meeting. Attending the meeting for Sprint were Kevin E. Brauer, Richard Morris, and Robert Thompson. Attending from BellSouth were Daune Ackerman, Sid Boren, Bill Stacy and Robert Blau.

BellSouth presented a demonstration of its prototype CLEC OSS system and its internal small business and consumer systems. BellSouth has filed a separate ex parte addressing its own presentation.

The general thrust of Sprint's presentation dealt with the need for development and adoption of a clearinghouse to serve as a gateway for CLECs and ILECs to process all types of pre-order, order, maintenance, repair and other types of OSS-related activities needed to foster a competitive local telecommunications service market. The current model with each ILEC building a proprietary interface for use by CLECs is inefficient and costly for both ILECs and CLECs and will hamper competitive entry because of the "many to many" interface problem. A clearinghouse solves this problem by creating a central gateway that may be coded to be CLECs and ILECs, thus allowing the use of a single interface rather than multiple interfaces.

At the meeting, BellSouth demonstrated a partial OSS solution for CLECs that provided many pre-order and order capabilities. This system was shown side-by-side with BellSouth's own consumer and small business systems.

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Sprint noted that the system demonstrated by BellSouth is a step in the right direction, but that it is not coded to industry standards and that it is not coded to a clearinghouse interface. Further, significant additional development is needed in the area of UNEs, complex orders, and repair. While BellSouth indicated that the system demonstrated has a high flow-through rate, Sprint believes that the lack of complete business rule disclosure by BellSouth creates significant implementation problems and what BellSouth terms "CLEC errors." Sprint believes that because complete underlying business rules have not been disclosed, CLEC users of the BellSouth system must rely upon trial and error to determine what is needed to get orders through the BellSouth edit process. While BellSouth refers to many of these problems as "CLEC errors" in submitting the orders, they are only errors from BellSouth's perspective because the CLECs lack information from BellSouth concerning the business rules underlying the system, and as a result submit orders that "error out." The fact that this kind of "error out" occurs, however, is in no sense attributable to any fault on the part of the CLEC.

In order to foster a truly competitive local service environment, Sprint believes that a clearinghouse that interconnects ILECs and CLECs and provides functionality in all required OSS areas is necessary. Current systems lack critical functionality, interconnection, industry standards, and business rule documentation. Further, any OSS system must also pass a third-party test to document compliance with standards and flow-through capability when presented with commercial volumes of orders.

Sincerely,

Richard Morris/cg

Richard Morris
VP-Local Market Integration

Attachment

cc: Chairman William Kennard
Kathy Brown

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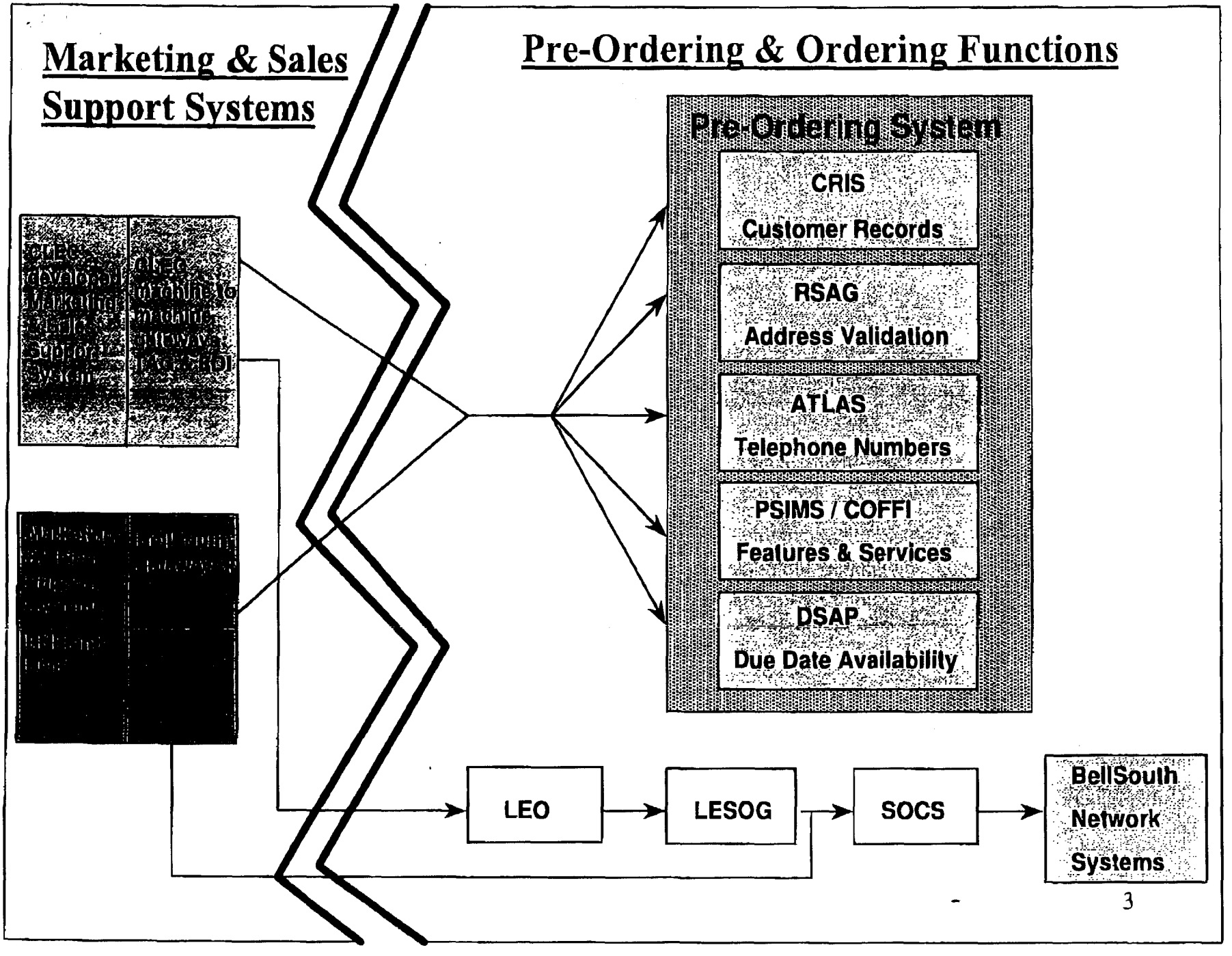
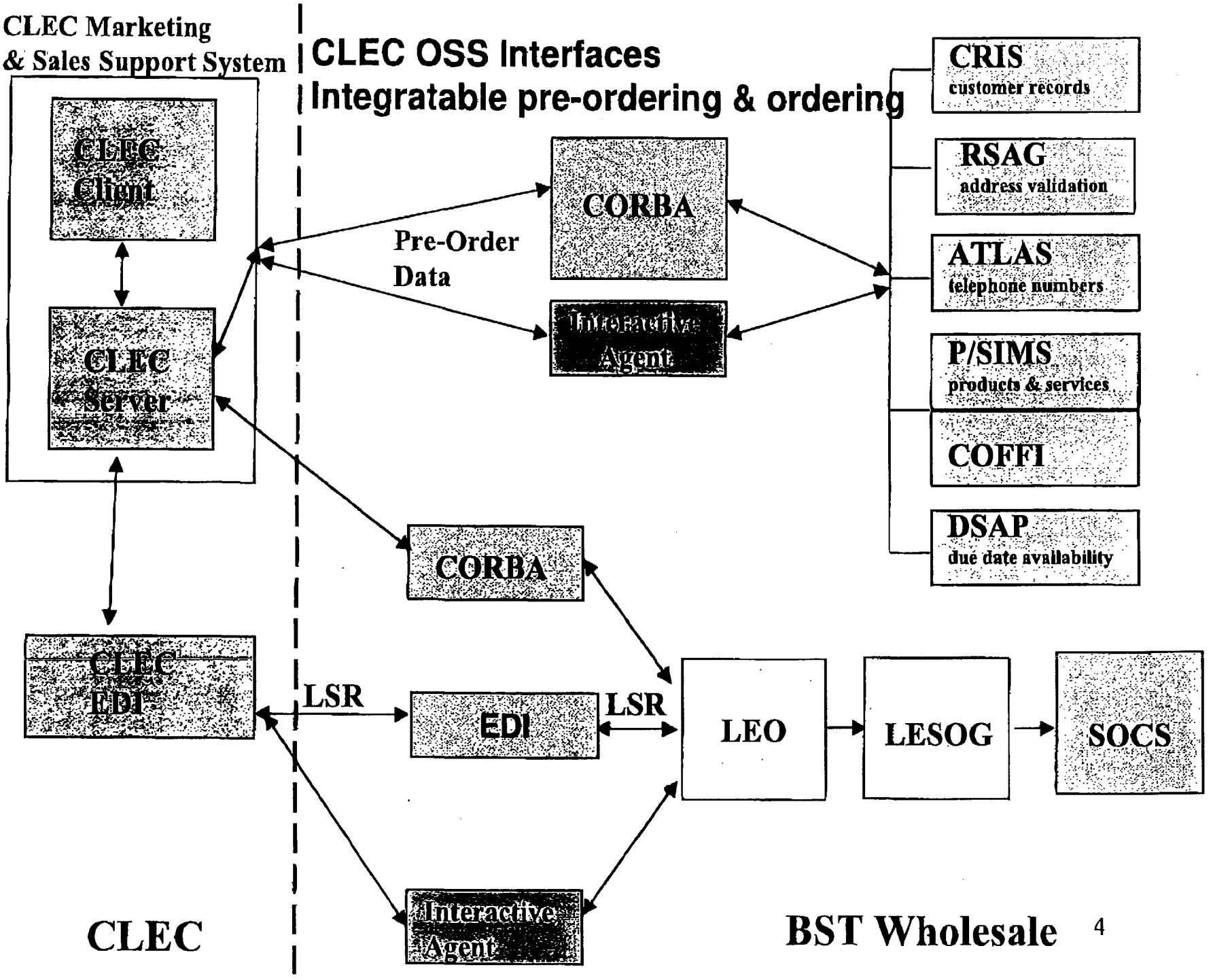
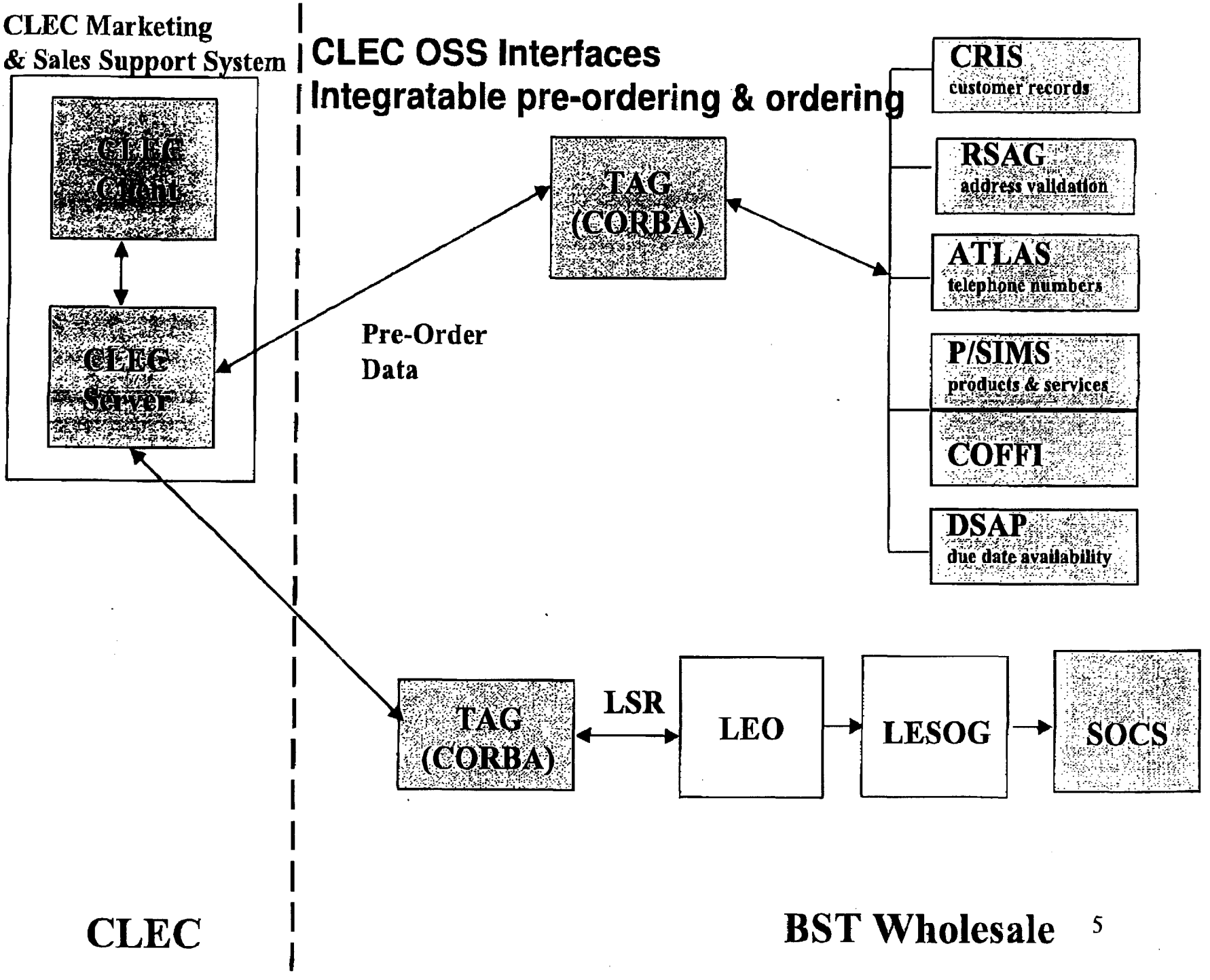
Operating Support Systems "OSS"

- What are they?
  - Computer support systems and the information contained in these systems used for certain functions in BellSouth's telecommunication's business.

- What do the Telecommunications Act and the FCC's orders require?
  - Integratable access to support system functions for:
    - pre-ordering, ordering, provisioning, maintenance and repair, and billing for network elements and resale services
  - Access to the information these systems contain


Marketing & Sales Support Systems
Pre-Ordering & Ordering Functions
Pre-Ordering System
CRIS
Customer Records
RSAG
Address Validation
ATLAS
Telephone Numbers
PSIMS / COFFI
Features & Services
DSAP
Due Date Availability
LEO
LESOG
SOCS
BellSouth
Network
Systems


CLEC Marketing
& Sales Support System
CLEC OSS Interfaces
Integratable pre-ordering & ordering
CLEC Client
CLEC Server
CLEC EDI
Pre-Order Data
CORBA
Interactive Agent
CRIS
customer records
RSAG
address validation
ATLAS
telephone numbers
P/SIMS
products & services
COFFI
DSAP
due date availability
CORBA
LSR
EDI
LSR
LEO
LESOG
SOCS
Interactive Agent
CLEC
BST Wholesale


CLEC Marketing
& Sales Support System
CLEC OSS Interfaces
Integratable pre-ordering & ordering
CLEC Client
CLEC Server
TAG (CORBA)
CRIS
customer records
RSAG
address validation
ATLAS
telephone numbers
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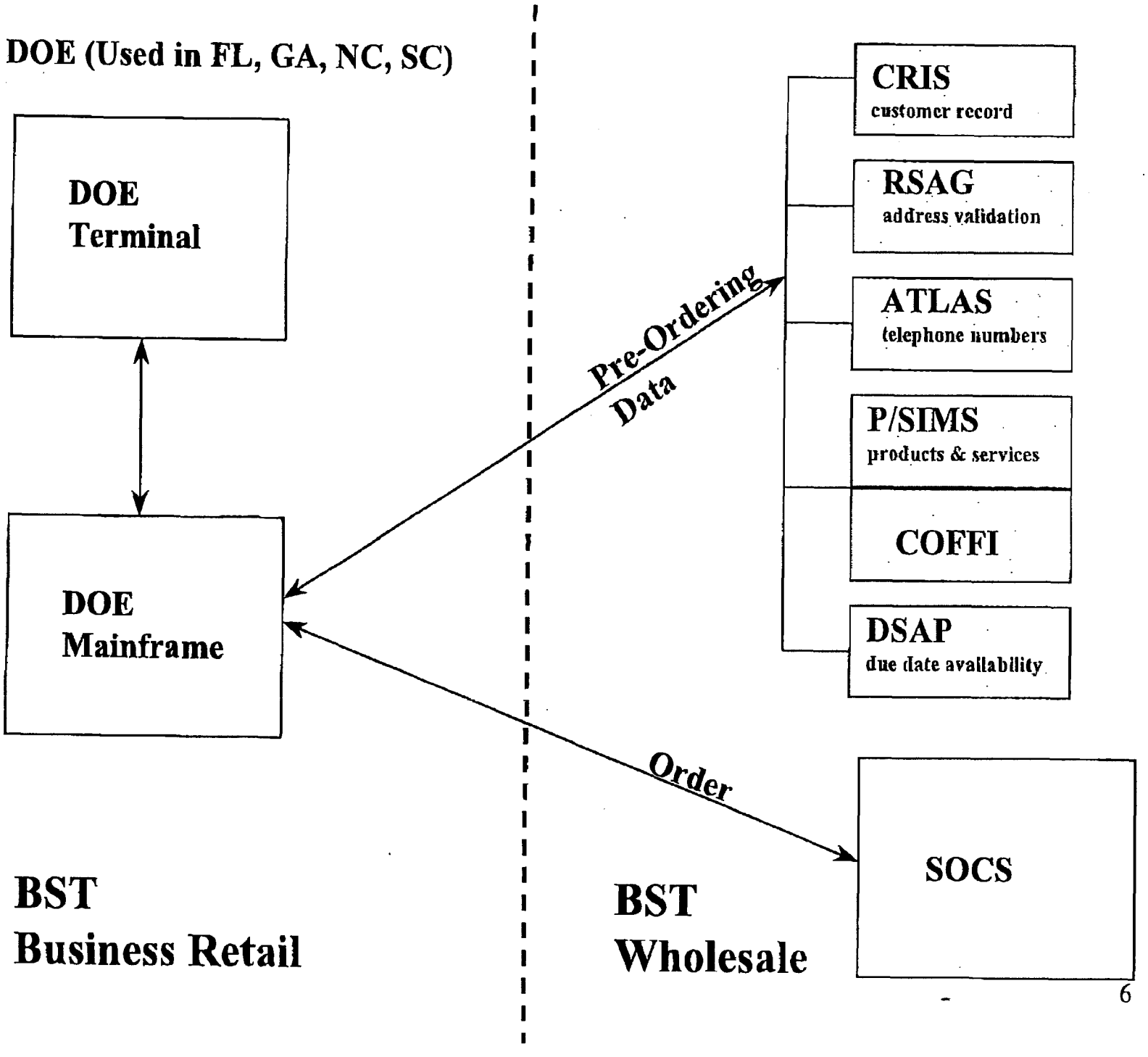
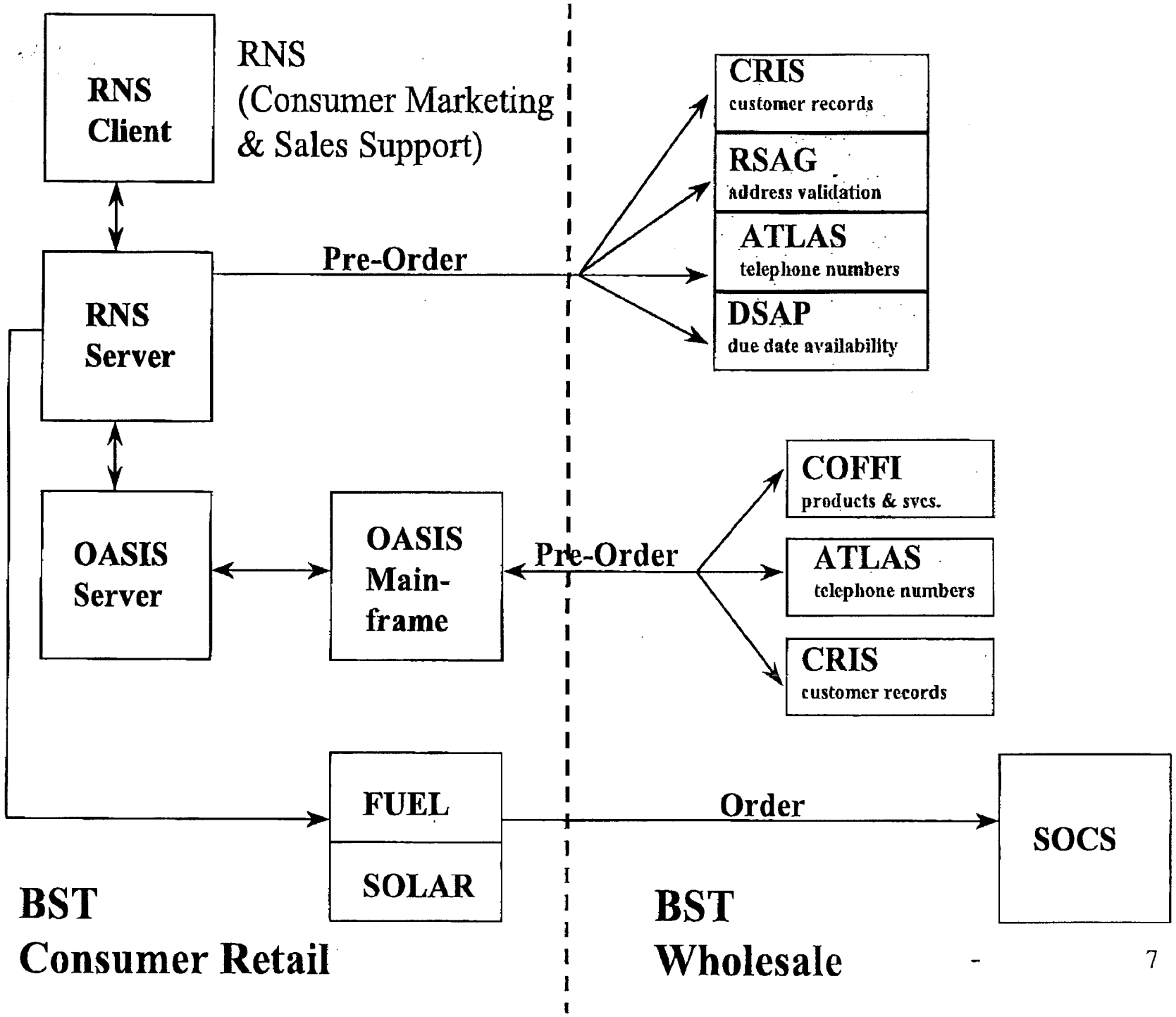
products & services
COFFI
DSAP
due date availability
Pre-Order Data
TAG (CORBA)
LSR
LEO
LESOG
SOCS
CLEC
BST Wholesale


DOE (Used in FL, GA, NC, SC)
DOE Terminal
DOE Mainframe
Pre-Ordering Data
Order
CRIS
customer record
RSAG
address validation
ATLAS
telephone numbers
P/SIMS
products & services
COFFI
DSAP
due date availability
SOCS
BST Business Retail
BST Wholesale


RNS Client
RNS
(Consumer Marketing
& Sales Support)
CRIS
customer records
RSAG
address validation
ATLAS
telephone numbers
DSAP
due date availability
Pre-Order
RNS Server
OASIS Server
OASIS Main-frame
Pre-Order
COFFI
products & svcs.
ATLAS
telephone numbers
CRIS
customer records
FUEL
SOLAR
Order
SOCS
BST
Consumer Retail
BST
Wholesale

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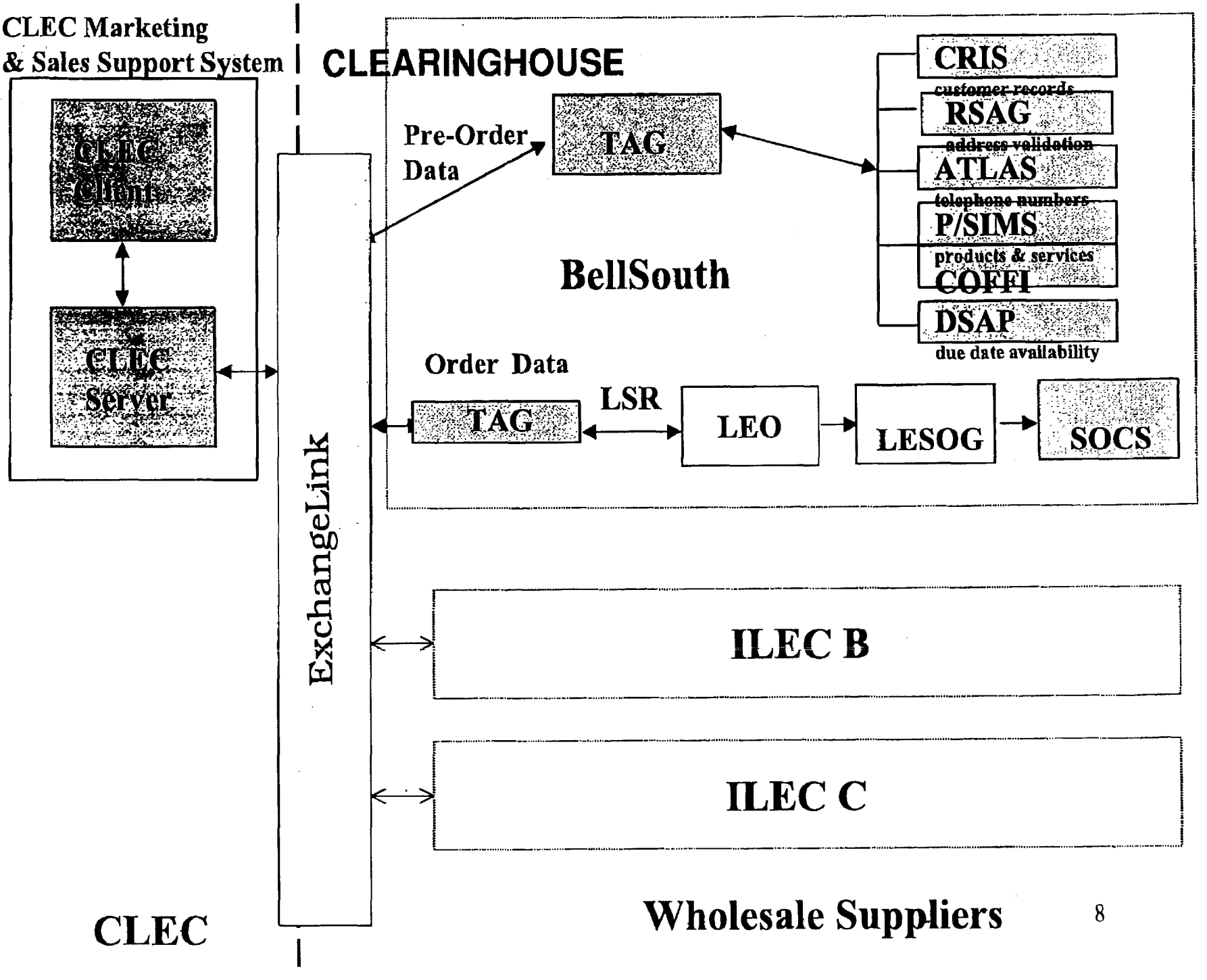

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The Case for a Telecom Industry OSS Clearinghouse - A Sprint Perspective

Kevin E. Brauer - President National Integrated Service

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The Industry needs a long term solution to foster competition

The Costs to build and maintain OSS is excessive for both CLECs and ILECs

- Both must maintain relationships, support and coordinate software enhancements with multiple Trading Partners
- Both are forced to support multiple electronic versions and manual interfaces for Trading Partners of various sophistication levels

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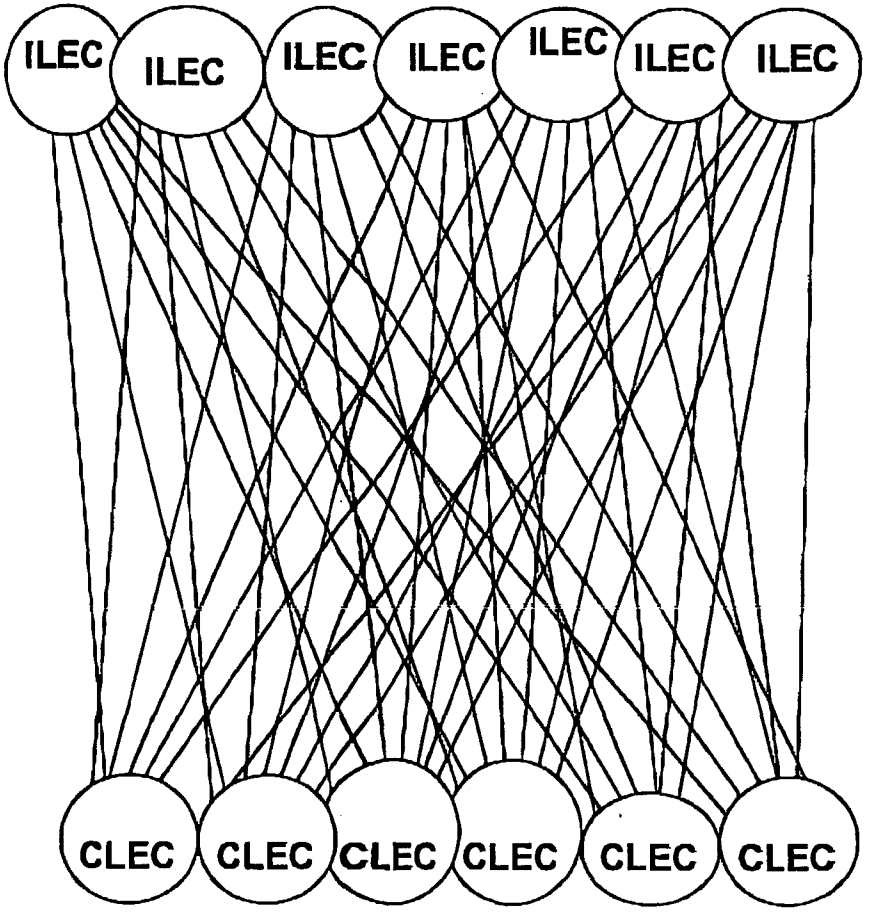
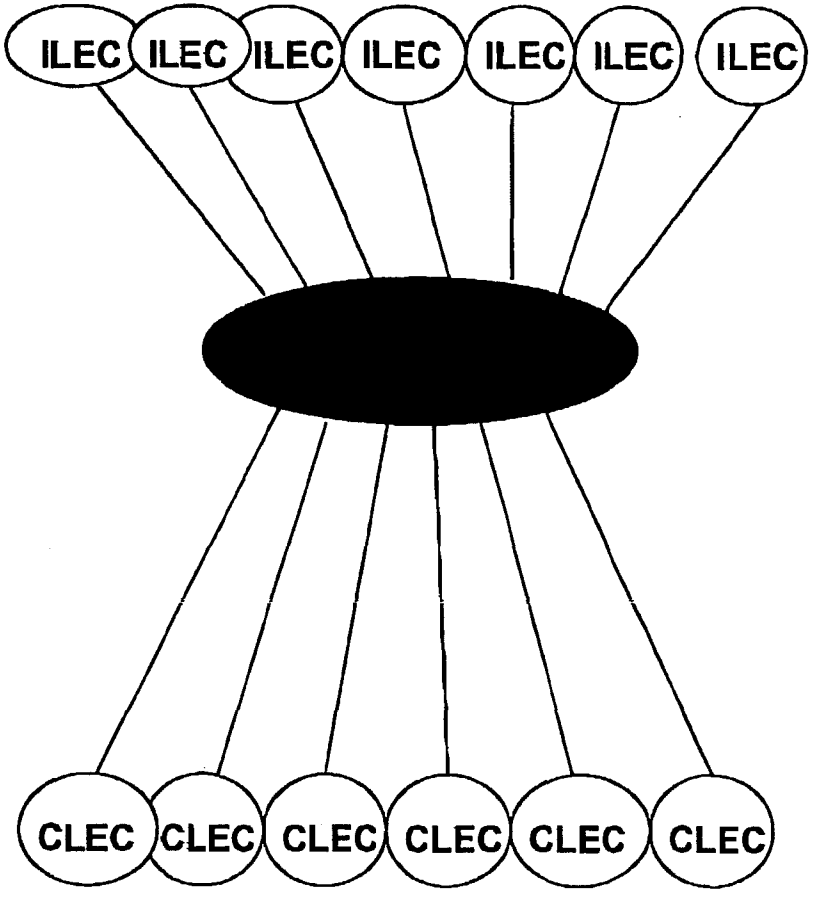
What we HAVE

Current Environment



What we NEED

Clearinghouse



Benefits to the Industry

- Providing a single approach for accessing all trading partners
- Convergence of new products and services to the consumer using a bundling retailer and multiple wholesalers (PCS, Local, Long Distance, etc)
- Reduce Costs to all consumers and Telecom companies
- Allow regulatory control of slamming and other detrimental actions towards consumers
- Foster a cooperative workable baseline for clean and valid data for Directory Information, 911 and LNP (Local Number Portability)

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How do we Solve the National OSS Problems

- Develop Real National Standards and Implement:
  - Order Type Rules (New, Change, Move etc.)
  - Usage Rules (Required, Optional, Conditional etc.)
  - Data Characteristics (Valid Values, Attributes etc.)
  - EDI (Transactions, Acknowledgements, etc.)
  - Tariff Rules (State, Switch, Products etc.)
  - Products/Services (USOC, FIDS, Compatibility etc.)
  - Exception Processes (Manual)
  - Editing Rules (Order Reject Codes)
  - Operational Rules (Processes)

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How do we Solve the National OSS Problems

- Engage Neutral 3rd Party(s) that certifies regional approval to a national standard
- Any regional approval must be validated against actual OSS to OSS testing
- Testing must be completed with pre approved national standards
- LNP - supports a national telephone number assignment process

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How do we Solve the National OSS Problems

- Clearinghouse must include the following functions (continued):
  - ⇒Pre – Order (including a strict standard for PARSED customer service record / information)
  - ⇒Order – utilizing all Order types (simple and complex) and include all products / services
  - ⇒Total reciprocal arrangements for CLEC to CLEC or CLEC back to ILEC for exchange of any of the above information

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How do we Solve the National OSS Problems

- Clearinghouse must include the following functions:
  - ⇒Network Provisioning (consistent unbundled elements and loops)
  - ⇒Trouble Administration
  - ⇒PIC Care Processing to support dialing parity
  - ⇒911, Directory Listing and LIDB

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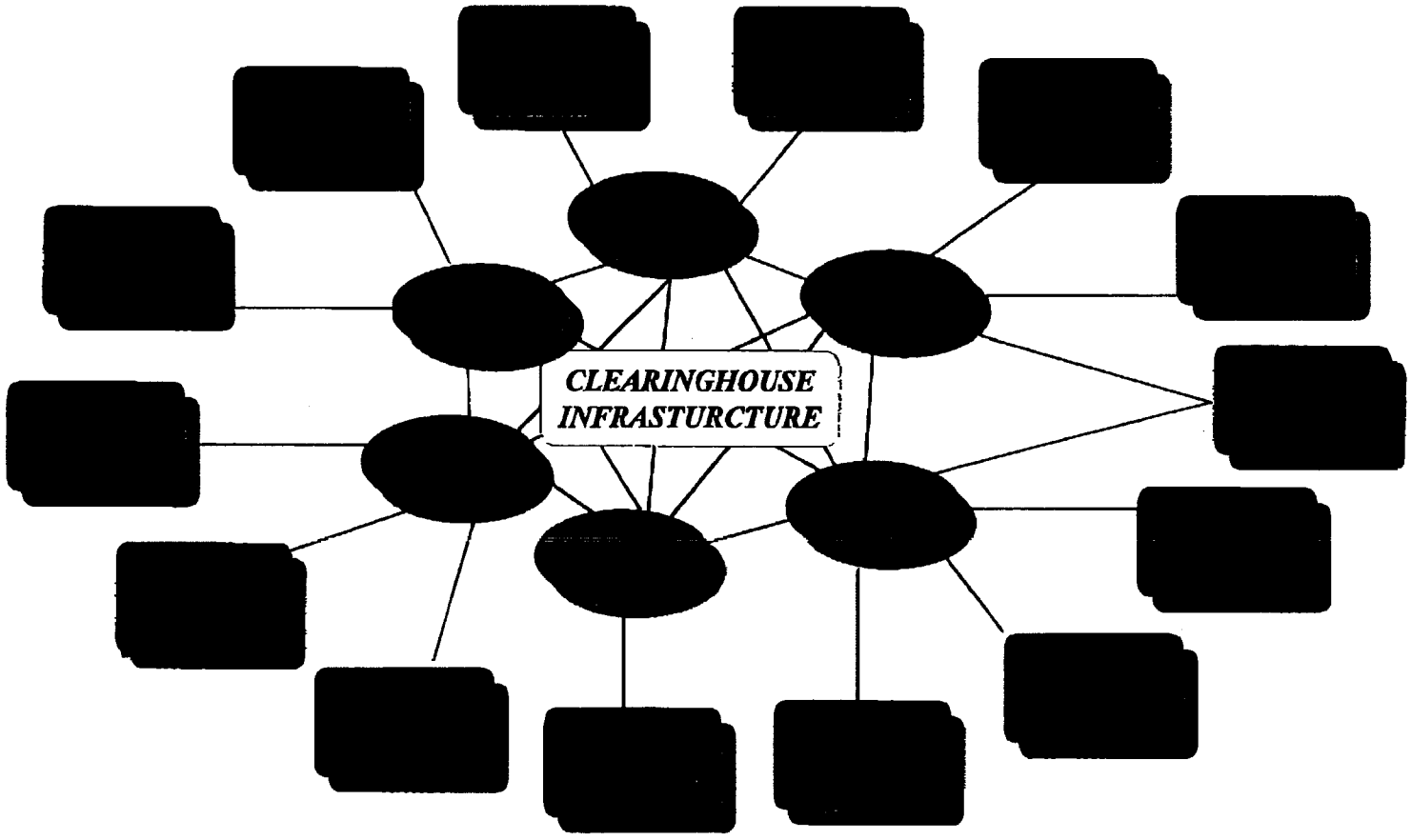
The Clearinghouse Concept - *Solving The "Many to Many" Problem with a platform for future service opportunities*



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Additional Comments

- An aggressive assumption for development of a clearinghouse supporting these stipulations would require 18- 24 months
- Not all Regional ILECs could meet this window as legacy systems require more complex modifications to obtain national standard
- Tier 2 and 3 ILECs could leverage Regional ILECs to further promote national standards

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The Industry has used Clearinghouses to Solve Similar Problems Before

- CMDS (centralized message data system)
- STARS (CMDS II)
- 800 Portability
- LNP (Local Number Portability)
- LIDB (Line Identification Data Base)